

## TYLER LAW FIRM

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January 10, 2017

Via PRIORITY MAIL and EMAIL  
(asteinberg@kslaw.com)  
(sdavidson@kslaw.com)

Arthur Steinberg, Esq.  
Scott Davidson, Esq.  
KING & SPALDING, LLP  
1185 Avenue of the Americas  
New York, New York 10036

RE: Kevin Honaker, Personal Representative of the Estate of Mariah J. Bailey-  
Collins, deceased v General Motors, LLC, Vic Canever Chevrolet, Inc., Hartland  
Towing & Garage and Regal Recycling, Inc.  
Genesee County Circuit Court Case No.: 15-105613-NP

Dear Sirs:

With respect to Mr. Davidson's correspondence of December 16, 2016 and the Order to  
Cause it is our position that our vehicle (2008 Chevrolet Cobalt - VIN  
1G1AL18F387162873) is a "Subject Vehicle" as noted on page 13 of the Order. As such,  
the above lawsuit represents an "Independent Claim", as noted on page 12, and is not  
subject to the bankruptcy proceedings.

If you disagree, please immediately notify me and the basis for your position. Thank you  
for your attention in this matter. I remain,

Very truly yours,



B. A. TYLER



BAT:dmw

Cc: Clerk of the Court – U.S. Bankruptcy Court, Southern District of New York  
(Case no. 09-50026(MG))  
Michael Cooney – GM counsel (via e-mail)  
Boyd White, III – GM counsel (via e-mail)